

Exhibit 20

1 UNITED STATES DISTRICT COURT

2 FOR THE WESTERN DISTRICT OF NEW YORK

3 -----
4 **BLACK LOVE RESISTS IN THE RUST, et al.,**
5 **individually and on behalf of a class of**
6 **all others similarly situated,**

7 Plaintiffs,

8 -vs-

1:18-cv-00719-CCR

9 **CITY OF BUFFALO, N.Y., et al.,**

10 Defendants.
11 -----

12 **ORAL EXAMINATION OF CHARLES MILLER**

13 **APPEARING REMOTELY FROM**

14 **ERIE COUNTY, NEW YORK**

15
16 June 2, 2023

17 9:32 a.m. - 4:49 p.m.

18 pursuant to notice
19
20

21 REPORTED BY:

22 Carrie A. Fisher, Notary Public

23 APPEARING REMOTELY FROM ERIE COUNTY, NEW YORK

-----DEPAOLO CROSBY REPORTING SERVICES, INC.-----

135 Delaware Avenue, Suite 301, Buffalo, New York 14202
716-853-5544

R E M O T E A P P E A R A N C E S

APPEARING FOR THE PLAINTIFFS:

**NATIONAL CENTER FOR LAW
AND ECONOMIC JUSTICE
BY: KARINA TEFFT, ESQ.**
50 Broadway, Suite 500
New York, New York 10004
(212) 633-6967

APPEARING FOR THE DEFENDANTS:

**HODGSON RUSS LLP
BY: PETER SAHASRABUDHE, ESQ.**
140 Pearl Street
Buffalo, New York 14202
(716) 848-1508

ALSO PRESENT:

ANJANA MALHOTRA, ESQ.
National Center for Law
and Economic Justice

CLAUDIA WILNER, ESQ.
National Center for Law
and Economic Justice

—DEPAOLO CROSBY REPORTING SERVICES, INC.—

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~~CHARLES MILLER~~

1 Q. It kind of depended on the day?

2 A. Yeah, it depended on the day, correct.

3 Q. Did all four of those lieutenants depending on
4 the day set your assignments at the Housing
5 Unit?

6 A. Yeah.

7 Q. Were you given specific assignments on a daily
8 basis?

9 A. We would have briefing. They would discuss
10 certain things that were brought up to them by
11 BMHA staff. We would be told, you know, "hey,
12 look, there's a complaint over here at the
13 Shaffer Village, one of you guys go check that
14 out." So, I mean, a car crew would like
15 volunteer, "okay, I will go over there." Or
16 "there is something over here at the
17 Langfields, can somebody check that out?"
18 "Okay, I will go over there."

19 Q. And that was daily that you had these
20 briefings?

21 A. Yeah.

22 Q. You mentioned one of your duties was
23 high-visibility patrol. What does that mean?

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~~CHARLES MILLER~~

1 A. That means high-visibility patrol, being in
2 the area presence, police presence. We used
3 to do park and walks through the different
4 BMHA properties where you actually park the
5 patrol car, you walk through the property so
6 people see you. It deters crime.

7 Q. And was traffic enforcement part of that?

8 A. Yes.

9 Q. Were checkpoints or roadblocks part of that as
10 well?

11 A. Yeah.

12 MR. SAHASRABUDHE: Form. You can
13 answer.

14 A. Yes.

15 Q. And, you know, back when we were talking just
16 a moment ago about your daily briefings,
17 were -- so this was all verbally communicated
18 to you, what was sort of on the docket?

19 A. Yes.

20 Q. Was anything communicated in writing?

21 A. Some of the 311 complaints were. You could
22 like go in the computer and print them up, or
23 the lieutenants would print them up and give

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1 STATE OF NEW YORK)

2) ss.

3 COUNTY OF ERIE)

4
5 I, Carrie Fisher, Notary Public, in and for
6 the County of Erie, State of New York, do
7 hereby certify:

8 That the witness whose testimony appears
9 hereinbefore was, before the commencement of
10 their testimony, duly sworn to testify the
11 truth, the whole truth and nothing but the
12 truth; that said testimony was taken pursuant
13 to notice at the time and place as herein set
14 forth; that said testimony was taken down by
15 me and thereafter transcribed into
16 typewriting, and I hereby certify the
17 foregoing testimony is a full, true and
18 correct transcription of my shorthand notes so
19 taken.

20 I further certify that I am neither counsel
21 for nor related to any party to said action,
22 nor in anyway interested in the outcome
23 thereof.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed my seal this
16th day of June, 2023.

20
21 

Carrie A. Fisher
Notary Public - State of New York
No. 01FI6240227
Qualified in Erie County
My commission expires 5/02/27

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